REMARKS

Claims 1-6, 8-10 and 12-26 are all the claims pending in the application.

I. Response to Rejection under 35 U.S.C. § 103(a)

Claims 1-6, 8-10 and 12-26 were rejected under 35 U.S.C. § 103(a) as obvious over French Patent No. 0001012 to Penot, which is the equivalent of U.S. Patent No. 6,951,897, in view of Japanese Patent Document No. 7-102115 to Nakajima for the reasons set forth in paragraph 2 at pages 2-4 of the Final Office Action.

Applicant respectfully traverses the rejection for the reasons of record and the following additional reasons.

The present invention relates to a tire belt which comprises an elastomeric composition based on:

- an isoprene elastomer,
- a reinforcing inorganic filler such as silica, and
- a specific silane coupling agent corresponding to formula (I).

Applicant submits herewith a Declaration under 37 C.F.R. § 1.132, further supporting the patentability of the presently claimed invention.

Specifically, as stated in the Declaration, Penot describes a combination of an alkoxysilane with an aldimine (R-CH=N-R) and a guanidine derivative, in a silica-filled rubber composition for tire (see abstract and claims). The tire treads described in Penot are for passenger cars (see col. 1, lines 16-19; Examples, col. 18, line 19; Example 3, col. 18, line 34; claims 48-63), which employ, in a known manner, rubber compositions based on synthetic elastomers such as SBR or BR (see Tables 1, 3, 5, 7, 9, 11, 13 of Penot). Penot does not exemplify rubber compositions based on natural or isoprene rubber.

Nakajima relates to rubber compositions which are directed to the belt of tires, used inside the tire. The rubber compositions of Nakajima, which are commonly called "internal mixes" by those skilled in the art, have obviously a completely different function, compared to rubber compositions commonly used in the tread (external mixes in contact with the road, thus requiring, in particular, a very high wear resistance). In particular, these "internal mixes" use natural or polyisoprene rubber as elastomer, but not synthetic elastomers such as SBR or BR as described in Penot;

Mr. ARAUJO DA SILVA thus concluded that, for those skilled in the art of tires, it would be illogical to combine Penot with Nakajima, which are in fact concerned by two completely different parts of a tire: the tread on one hand (Penot) and the belt on the other (Nakajima).

Moreover, even if, *arguendo*, one would combine Penot and Nakajima, those of ordinary skill in the art might simply test a combination of aldimine and a guanidine derivative in the belt rubber coating of Nakajima; however, they certainly would not replace the conventional and well-known TESPT as coupling agent, which is used "worldwide" and precisely that used by both Penot and Nakajima in their working Examples.

Furthermore, the presently claimed invention can provide unexpected results, as demonstrated by the data in the present specification and explained in the previous responses. Specifically, composition C-3, which employed a monoalkoxysilane (MESPT) as coupling agent according to the present invention, showed a roughly 50% increase in terms of resistance to fatigue and cracking, as compared to composition C-2, which employed TESPT as coupling agent.

In view of the foregoing, Applicant respectfully submits that the present claims are not obvious over Penot in view of Nakajima, and thus the rejection should be withdrawn.

II. Conclusion

From the foregoing, further and favorable action in the form of a Notice of Allowance is believed to be next in order and such action is earnestly solicited. If there are any questions concerning this paper or the application in general, the Examiner is invited to telephone the undersigned at (202) 452-7932 at his earliest convenience.

Respectfully submitted,

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